November 15, 2002

RE: Frito-Lay, Inc. 023-16054-00020
TO: Interested Parties / Applicant

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this approval is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, IN 46204, **within (18) eighteen days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

(1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
(2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
(3) the date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

(1) the name and address of the person making the request;
(2) the interest of the person making the request;
(3) identification of any persons represented by the person making the request;
(4) the reasons, with particularity, for the request;
(5) the issues, with particularity, proposed for consideration at any hearing; and
(6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosure

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Frank O'Bannon
Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

November 25, 2002

Frank Armetta
Frito-Lay, Inc.
323 S. County Rd., 300 W.
Frankfort, IN 46041-8780

Re: 023-16054-00020
Second Minor Source Modification to:
Part 70 permit No.: T023-7721-00020

Dear Mr. Armetta:

Frito-Lay, Inc. was issued Part 70 operating permit T023-7721-00020 on April 12, 2001 for the operation of a snack food products manufacturing plant. An application to modify the source was received on September 4, 2002. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source:

Storage and transfer operations, consisting of:

(a) one (1) Corn Unloading/Storage Silo #4 , identified as NBP-9C, utilizing a fabric filter for particulate control and exhausting to stack NBP-9C;

(b) one (1) Corn Unloading/Storage Silo #5, identified as NBP-9D, utilizing a fabric filter for particulate control and exhausting to stack NBP-9D;

(c) one (1) Corn Transfer/Cleaner, identified as NBP-9E, utilizing a fabric filter for particulate control and exhausting to stack NBP-9E;

(d) one (1) Cornmeal Unloading Silo #3, identified as NBP-22A, utilizing a fabric filter for particulate control and exhausting to stack NBP-22A.

The following construction conditions are applicable to the proposed project:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).

2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

The source may begin construction when the minor source modification has been issued. Operating conditions shall be incorporated into the Part 70 operating permit as a significant permit modification in accordance with 326 IAC 2-7-10.5(l)(2) and 326 IAC 2-7-12(d)(1).

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter call Alic Bent at (973) 575-2555, ext. 3206, or call (800) 451-6027, press 0 and ask for extension 3-6878.

Sincerely,

Original Signed by Paul Dubenetzky
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
AB/EVP
cc: File - Clinton County
Air Compliance Section Inspector - Eric Courtright
Compliance Data Section - Karen Nowak
Technical Support and Modeling - Michele Boner
Administrative and Development

MINOR SOURCE MODIFICATION
OFFICE OF AIR QUALITY

Frito-Lay, Inc.
323 S. County Rd., 300 W.
Frankfort, Indiana 46041-8780

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Second Minor Source Modification No.: 023-16054-00020	
Issued by: Original Signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: November 15, 2002

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary manufacturing operation of various snack food products.

Responsible Official:	Director of Operations
Source Address:	323 S. County Road 300 W., Frankfort, IN 46041
Mailing Address:	323 S. County Road 300 W., Frankfort, IN 46041
Phone Number:	765-659-6505
SIC Code:	2096
County Location:	Clinton
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary modification consists of the following emission units and pollution control devices:

Storage and transfer operations, consisting of:

(a) one (1) Corn Unloading/Storage Silo #4 , identified as NBP-9C, utilizing a fabric filter for particulate control and exhausting to stack NBP-9C;

(b) one (1) Corn Unloading/Storage Silo #5, identified as NBP-9D, utilizing a fabric filter for particulate control and exhausting to stack NBP-9D;

(c) one (1) Corn Transfer/Cleaner, identified as NBP-9E, utilizing a fabric filter for particulate control and exhausting to stack NBP-9E;

(d) one (1) Cornmeal Unloading Silo #3, identified as NBP-22A, utilizing a fabric filter for particulate control and exhausting to stack NBP-22A;

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary modification does not have any insignificant activities, as defined in 326 IAC 2-7-1(21).

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(b) East plant, consisting of the following:

(9) Storage and transfer operations, consisting of:

(A) three (3) Corn Receiving/Storage (3 silos), identified as NBP9A(F) constructed in 1990 and exhausting to stack NBP9A(F);

(B) Corn Internal Ops (Cleaner), identified as NBP9B(F), constructed in 1990, utilizing a fabric filter for particulate control and exhausting indoors as fugitive dust: NBP9B(F);

(C) one (1) Wheat Grain Receiving/Storage (Silo 1), identified as NBP18, constructed in 1994, utilizing a fabric filter for particulate control and exhausting to stack NBP18;

(D) one (1) Wheat Grain Receiving/Storage (Silo 2), identified as NBP19, constructed in 1994, utilizing a fabric filter for particulate control and exhausting to stack NBP19;

(E) Whole Grain Cleaner, identified as NBP17(F), constructed in 1994, utilizing a fabric filter for particulate control and exhausting indoors as fugitive dust: NBP17(F);

(F) one (1) Corn Meal Receiving/Storage (Silo 1), identified as NBP20, constructed in 1991, utilizing a fabric filter for particulate control and exhausting to stack NBP20;

(G) one (1) Corn Meal Receiving/Storage (Silo 2), identified as NBP21, constructed in 1991, utilizing a fabric filter for particulate control and exhausting to stack NBP21;

(H) one (1) Corn Meal Transfer, identified as NBP22(F), constructed in 1991, utilizing a fabric filter and exhausting indoors as fugitive dust: NBP22(F);

(I) one (1) Wheat Meal Receiving/Storage (Silo 1), identified as NBP23, constructed in 1991, utilizing a fabric filter for particulate control and exhausting to stack NBP23;

(J) one (1) Wheat Meal Receiving/Storage (Silo 2), identified as NBP24, constructed in 1991, utilizing a fabric filter for particulate control and exhausting to stack NBP24;

(K) one (1) Wheat Meal Transfer, identified as NBP25(F), constructed in 1991, utilizing a fabric filter for particulate control and exhausting indoors as fugitive dust: NBP25(F);

(L) one (1) Corn Unloading/Storage Silo #4 , identified as NBP-9C, utilizing a fabric filter for particulate control and exhausting to stack NBP-9C;

(M) one (1) Corn Unloading/Storage Silo #5, identified as NBP-9D, utilizing a fabric filter for particulate control and exhausting to stack NBP-9D;

(N) one (1) Corn Transfer/Cleaner, identified as NBP-9E, utilizing a fabric filter for particulate control and exhausting to stack NBP-9E;

(O) one (1) Cornmeal Unloading Silo #3, identified as NBP-22A, utilizing a fabric filter for particulate control and exhausting to stack NBP-22A;

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the snackfood manufacturing operation shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of allowable emissions in pounds per hour; and P = process weight rate in tons per hour

The source is complying with the limits and the compliance calculations for 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) are contained in a confidential file.

D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the fabric filter controlled devices venting to the atmosphere associated with equipments identified as NBP-9E, NBP-22A, NBP-18, NBP-19, NBP-20, NBP-21, NBP-23, NBP-24, NBP-37, and NBP-38 and their control devices.

D.2.3 Particulate Matter Emissions

(a) Pursuant to OP12-11-88-0121, issued on December 17, 1984, all corn shall be precleaned before being received at the plant.

(b) Pursuant to CP023-0020-0142, the corn cleaning and sizing fabric filter (NBP-9B) shall have no visible emissions crossing the proper line or exceeding 10% opacity over a six minute averaging period at the equipment site.

Compliance Determination Requirements

D.2.4 Particulate Matter (PM)

The fabric filters for PM control shall be in operation and control emissions from the equipments identified in Condition D.2.2 at all times that the equipments are in operation.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.2.5 Visible Emissions Notations

(a) Visible emission notations of NBP-9E and NBP-22A stack exhausts shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.2.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses used in conjunction with NBP-9E and NBP-22A, at least once per shift when the units are in operation. When for any one reading, the pressure drop across the baghouses are outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan -Failure to Take Response. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instruments Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.2.7 Baghouse Inspections

An inspection shall be performed each calender quarter of all bags controlling the units. All defective bags shall be replaced.

D.2.8 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.9 Record Keeping Requirements

(a) To document compliance with Condition D.2.5, the Permittee shall maintain once per shift records of visible emission notations of NBP-9E and NBP-22A stack exhausts.

(b) To document compliance with Condition D.2.6, the Permittee shall maintain once per shift records of the total differential static pressure during normal operation.

(c) To document compliance with Condition D.2.7, the Permittee shall maintain records of the results of the inspections required under Condition D.2.7.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Mail to: Permit Administration & Development Section
Office Of Air Quality
100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015

Frito-Lay, Inc.
323 S. County Rd., 300 W.,
Frankfort, Indiana 46041-8780

Affidavit of Construction

I, _____, being duly sworn upon my oath, depose and say:
(Name of the Authorized Representative)

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.

2. I hold the position of _____ for _____.
(Title) (Company Name)

3. By virtue of my position with _____,I have personal
(Company Name)
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of _____ .
(Company Name)

4. I hereby certify that Frito-lay, Inc., 323 S. County Rd., 300 W., Frankfort, Indiana 46041-8780, completed construction of the new storage/transfer equipments on _____in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on September 4, 2002 and as permitted pursuant to **Minor Source Modification Permit No. MSM-023-16054-00020** issued on _____

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

_____
Signature

_____
Date

STATE OF INDIANA)
)SS
COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County and State of Indiana on this _____ day of _____, 20 _____ .

My Commission expires: _____

_____
Signature

_____
Name (typed or printed)

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Part 70 Minor Source Modification and a Part 70 Significant Permit Modification.

Source Background and Description

Source Name:	**Frito-Lay, Inc.**
Source Location:	**323 S. County Rd., 300 W., Frankfort, IN 46041-8780**
County:	**Clinton**
SIC Code:	**2096**
Operation Permit No.:	**T 023-7721-00020**
Operation Permit Issuance Date:	**April 12, 2001**
Minor Source Modification No.:	**023-16054-00020**
Significant Permit Modification No.:	**023-16204-00020**
Permit Reviewer:	**Alic Bent/EVP**

The Office of Air Quality (OAQ) has reviewed a modification application from Frito-Lay, Inc. relating to the construction of the following emission units and pollution control devices:

Storage and transfer operations, consisting of:

(a) Corn Unloading/Storage Silo #4 , identified as NBP-9C, utilizing a fabric filter for particulate control and exhausting to stack NBP-9C;

(b) Corn Unloading/Storage Silo #5, identified as NBP-9D, utilizing a fabric filter for particulate control and exhausting to stack NBP-9D;

(c) Corn Transfer/Cleaner, identified as NBP-9E, utilizing a fabric filter for particulate control and exhausting to stack NBP-9E;

(d) Cornmeal Unloading Silo #3, identified as NBP-22A, utilizing a fabric filter for particulate control and exhausting to stack NBP-22A;

History

On September 4, 2002, Frito-Lay, Inc. submitted an application to the OAQ requesting to add additional storage and transfer operations to their existing plant. Frito-Lay, Inc. was issued a Part 70 permit on April 12, 2001.

Existing Approvals

The source was issued a Part 70 Operating Permit T023-7721-00020 on April 12, 2001. The source has since received the following:

(a) Minor Source Modification No.: 023-11082, issued on July 23, 1999;

(b) Exemption No.: 023-11942, issued on June 12, 2000;

(c) First Administrative Amendment No.: 023-14229, issued on May 31, 2001; and

(d) Second Administrative Amendment No.: 023-16101, issued on September 12, 2002.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (^{0}F)
NBP-9C	Unloading/Storage	61	0.5	19	Ambient
NBP-9D	Unloading/Storage	61	0.5	19	Ambient
NBP-9E	Transfer/Cleaning	43	1.67	4900	Ambient
NBP-22A	Unloading	70	0.67	500	Ambient

Recommendation

The staff recommends to the Commissioner that the Minor Source Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on September 4, 2002.

Emission Calculations

See Appendix A: page 1 of 1 of this document for detailed emissions calculations**.**

Potential To Emit Before Controls (Modification)

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

Pollutant	Potential To Emit (tons/year)
PM	204.16
PM-10	204.16
SO_2	0.0
VOC	0.0
CO	0.0
NO_x	0.0

Justification for Modification

The Title V permit is being modified through a Minor Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5(d)(5)(C), this is a minor source modification for which the potential to emit of PM-10 is limited to less than twenty-five (25) tons per year by using a baghouse with better than 99% control efficiency. The Minor Source Modification will be incorporated into the permit through a Significant Permit Modification because new compliance monitoring conditions are required to be added to the existing title V permit.

County Attainment Status

The source is located in Clinton County.

Pollutant	Status
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Clinton County has been designated as attainment or unclassifiable for ozone.

(b) Clinton County has been classified as attainment for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(c) Fugitive Emissions
This type of operation is not one of the 28 listed source categories under 326 IAC 2-2; therefore, the fugitive PM emissions are not counted toward determination of PSD applicability.

Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	greater than 100, less than 250
PM-10	greater than 100, less than 250
SO_2	greater than 250
VOC	less than 100
CO	less than100
NOx	greater than 250

(a) This existing source is a major stationary source because an attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.

(b) These emissions are based upon the Part 70 permit T023-7721-00020 issued on April 12, 2001.

Potential to Emit of Modification After Issuance

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units for the modification.

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
NBP-9C (1)	0.01	0.01	-	-	-	-	-
NBP-9D (1)	0.01	0.01	-	-	-	-	-
NBP-9E (1)	1.84	1.84	-	-	-	-	-
NBP-22A (1)	0.19	0.19	-	-	-	-	-
Total Emissions	2.05	2.05	-	-	-	-	-

(1) Based on controlled PM and PM-10 potential emissions.

This modification to an existing major stationary source is not major because the emissions increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2 and 40 CFR 52.21, the PSD requirements do not apply.

Federal Rule Applicability

(a) This modification is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.300, Subpart DD- Standards of Performance for Grain Elevators), because this modification does not have grain terminal elevators with a permanent storage capacity of more than 2.5 million U.S. bushels or grain storage elevators with a permanent grain storage capacity of 1 million bushels.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Subpart 63) applicable to this source.

State Rule Applicability - Individual Facilities

326 IAC 2-2 and 40 CFR 52.21 (Prevention of Significant Deterioration (PSD))

This modification to a PSD major source is not subject to this rule. This rule applies to modifications with the potential to emit (PTE) greater than or equal to 25 tons of PM per year and the potential to emit (PTE) greater than or equal to 15 tons of PM-10 per year. This modification is controlled to a PTE PM and PM-10 of 2.05 tons per year each by using fabric filters. Therefore, pursuant to 326 IAC 2-2 and 40 CFR 52.21, the PSD requirements do not apply.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-2 the particulate shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

Facilities	Process Weight Rate (tons/hr)	PM Allowable Emissions (lb/hr)	Compliance Calculations (lb/hr)
NBP-9C	confidential	5.0	0.16 (uncontrolled)
NBP-9D	confidential	5.0	0.16 (uncontrolled)
NBP-9E	confidential	12.0	0.42
NBP-22A	confidential	15.0	0.04

These facilities are in compliance with these PM allowable emissions, since their emissions after control are less than the PM allowable emissions. The baghouses shall be in operation at all times NBP-9E and NBP-22A are in operation, in order to comply with these limits.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. NBP-9E and NBP-22A have applicable compliance monitoring conditions as specified below:

   (a) Once per shift visible emissions notations of NBP-9E and NBP-22A stack exhausts shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

(b) The Permittee shall record the total static pressure drop across the baghouses controlling NBP-9E and NBP-22A, at least once per shift when the units are in operation. When for any one reading, the pressure drop across the baghouses are outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports.

(c) An inspection shall be performed each calender quarter of all bags controlling NBP-9E and NBP-22A. All defective bags shall be replaced.

(d) In the event that bag failure has been observed:

(1) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(2) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

These monitoring conditions are necessary because the baghouses for NBP-9E and NBP-22A must operate properly to ensure compliance with 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-7 (Part 70).

Changes to the Part 70 Permit

The following changes are made as the Significant Permit Modification to the Part 70 Permit T023-7721-00020. (New is shown in bold and deleted language is shown with a line through it):

1. Section A.2 has been revised to include the new equipments (NBP-9C, NBP-9D, NBP-9E and NBP-22A).

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(b) East plant, consisting of the following:
- (9) Storage and transfer operations, consisting of:
  - (A) three (3) Corn Receiving/Storage (3 silos), identified as NBP9A(F) constructed in 1990 and exhausting to stack NBP9A(F);
  - (B) Corn Internal Ops (Cleaner), identified as NBP9B(F), constructed in 1990, utilizing a fabric filter for particulate control and exhausting indoors as fugitive dust: NBP9B(F);
  - (C) one (1) Wheat Grain Receiving/Storage (Silo 1), identified as NBP18, constructed in 1994, utilizing a fabric filter for particulate control and exhausting to stack NBP18;
  - (D) one (1) Wheat Grain Receiving/Storage (Silo 2), identified as NBP19, constructed in 1994, utilizing a fabric filter for particulate control and exhausting to stack NBP19;
  - (E) Whole Grain Cleaner, identified as NBP17(F), constructed in 1994, utilizing a fabric filter for particulate control and exhausting indoors as fugitive dust:: NBP17(F);
  - (F) one (1) Corn Meal Receiving/Storage (Silo 1), identified as NBP20, constructed in 1991, utilizing a fabric filter for particulate control and exhausting to stack NBP20;
  - (G) one (1) Corn Meal Receiving/Storage (Silo 2), identified as NBP21, constructed in 1991, utilizing a fabric filter for particulate control and exhausting to stack NBP21;
  - (H) one (1) Corn Meal Transfer, identified as NBP22(F), constructed in 1991, utilizing a fabric filter and exhausting indoors as fugitive dust: NBP22(F);
  - (I) one (1) Wheat Meal Receiving/Storage (Silo 1), identified as NBP23, constructed in 1991, utilizing a fabric filter for particulate control and exhausting to stack NBP23;
  - (J) one (1) Wheat Meal Receiving/Storage (Silo 2), identified as NBP24, constructed in 1991, utilizing a fabric filter for particulate control and exhausting to stack NBP24;
  - (K) one (1) Wheat Meal Transfer, identified as NBP25(F), constructed in 1991, utilizing a fabric filter for particulate control and exhausting indoors as fugitive dust: NBP25(F);
  - **(L) Corn Unloading/Storage Silo #4 , identified as NBP-9C, utilizing a fabric filter for particulate control and exhausting to stack NBP-9C;**
  - **(M) Corn Unloading/Storage Silo #5, identified as NBP-9D, utilizing a fabric filter for particulate control and exhausting to stack NBP-9D;**
  - **(N) Corn Transfer/Cleaner, identified as NBP-9E, utilizing a fabric filter for particulate control and exhausting to stack NBP-9E;**
  - **(O) Cornmeal Unloading Silo #3, identified as NBP-22A, utilizing a fabric filter for particulate control and exhausting to stack NBP-22A;**

2. Equipment list for section D.2 has been revised to include the new equipments (NBP-9C, NBP-9D, NBP-9E and NBP-22A).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(b) East plant, consisting of the following:

(9) Storage and transfer operations, consisting of:

(A) three (3) Corn Receiving/Storage (3 silos), identified as NBP9A(F) constructed in 1990 and exhausting to stack NBP9A(F);

(B) Corn Internal Ops (Cleaner), identified as NBP9B(F), constructed in 1990, utilizing a fabric filter for particulate control and exhausting indoors as fugitive dust: NBP9B(F);

(C) one (1) Wheat Grain Receiving/Storage (Silo 1), identified as NBP18, constructed in 1994, utilizing a fabric filter for particulate control and exhausting to stack NBP18;

(D) one (1) Wheat Grain Receiving/Storage (Silo 2), identified as NBP19, constructed in 1994, utilizing a fabric filter for particulate control and exhausting to stack NBP19;

(E) Whole Grain Cleaner, identified as NBP17(F), constructed in 1994, utilizing a fabric filter for particulate control and exhausting indoors as fugitive dust: NBP17(F);

(F) one (1) Corn Meal Receiving/Storage (Silo 1), identified as NBP20, constructed in 1991, utilizing a fabric filter for particulate control and exhausting to stack NBP20;

(G) one (1) Corn Meal Receiving/Storage (Silo 2), identified as NBP21, constructed in 1991, utilizing a fabric filter for particulate control and exhausting to stack NBP21;

(H) one (1) Corn Meal Transfer, identified as NBP22(F), constructed in 1991, utilizing a fabric filter and exhausting indoors as fugitive dust: NBP22(F);

(I) one (1) Wheat Meal Receiving/Storage (Silo 1), identified as NBP23, constructed in 1991, utilizing a fabric filter for particulate control and exhausting to stack NBP23;

(J) one (1) Wheat Meal Receiving/Storage (Silo 2), identified as NBP24, constructed in 1991, utilizing a fabric filter for particulate control and exhausting to stack NBP24;

(K) one (1) Wheat Meal Transfer, identified as NBP25(F), constructed in 1991, utilizing a fabric filter for particulate control and exhausting indoors as fugitive dust: NBP25(F);

(L) one (1) Corn Unloading/Storage Silo #4 , identified as NBP-9C, utilizing a fabric filter for particulate control and exhausting to stack NBP-9C;

(M) one (1) Corn Unloading/Storage Silo #5, identified as NBP-9D, utilizing a fabric filter for particulate control and exhausting to stack NBP-9D;

(N) one (1) Corn Transfer/Cleaner, identified as NBP-9E, utilizing a fabric filter for particulate control and exhausting to stack NBP-9E;

(O) one (1) Cornmeal Unloading Silo #3, identified as NBP-22A, utilizing a fabric filter for particulate control and exhausting to stack NBP-22A;

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

3. Condition D.2.1 has been updated to include revisions made to the 326 IAC 6-3 rule, which became effective June 12, 2002. Condition D.2.5 has been deleted, and compliance monitoring and record keeping requirements have been added as new conditions D.2.5, D.2.6, D.2.7, D.2.8 and D.2.9 for units NBP-9E and NBP-22A.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate ~~Matter (PM)~~ [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (~~Process Operations~~ **Particulate Emission Limitations for Manufacturing Processes**), the **allowable** particulate ~~matter (PM)~~ emission rate from the snackfood manufacturing operation shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of allowable emissions in pounds per hour; and P = process weight rate in tons per hour

The source is complying with the limits and the compliance calculations for 326 IAC 6-3-2 (~~Process Operations~~ **Particulate Emission Limitations for Manufacturing Processes**) are contained in a confidential file.

D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the fabric filter controlled devices venting to the atmosphere associated with equipment**s** identified as **NBP-9E, NBP-22A,** NBP-18, NBP-19, NBP-20, NBP-21, NBP-23, NBP-24, NBP-37, and NBP-38 and their control devices.

D.2.3 Particulate Matter Emissions

(a) Pursuant to OP12-11-88-0121, issued on December 17, 1984, all corn shall be precleaned before being received at the plant.

(b) Pursuant to CP023-0020-0142, the corn cleaning and sizing fabric filter (NBP-9B) shall have no visible emissions crossing the proper line or exceeding 10% opacity over a six minute averaging period at the equipment site.

Compliance Determination Requirements

D.2.4 Particulate Matter (PM)

The fabric filters for PM control shall be in operation and control emissions from the equipments identified in Condition D.2.2 at all times that the equipment**s** ~~is~~ **are** in operation.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.2.5 Visible Emissions Notations

(a) Visible emission notations of NBP-9E and NBP-22A stack exhausts shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.2.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses used in conjunction with NBP-9E and NBP-22A, at least once per shift when the units are in operation. When for any one reading, the pressure drop across the baghouses are outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan -Failure to Take Response. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instruments Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.2.7 Baghouse Inspections

An inspection shall be performed each calender quarter of all bags controlling the units. All defective bags shall be replaced.

D.2.8 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

~~**Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**~~

~~D.2.5 Record Keeping Requirements~~

~~(a) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.~~

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.9 Record Keeping Requirements

(a) To document compliance with Condition D.2.5, the Permittee shall maintain once per shift records of visible emission notations of NBP-9E and NBP-22A stack exhausts.

(b) To document compliance with Condition D.2.6, the Permittee shall maintain once per shift records of the total differential static pressure during normal operation.

(c) To document compliance with Condition D.2.7, the Permittee shall maintain records of the results of the inspections required under Condition D.2.7.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Conclusion

The operation of this snack food manufacturing operation shall be subject to the conditions of the attached proposed Minor Source Modification No. 023-16054-00020 and Significant Permit Modification No. 023-16204-00020.

Appendix A: Process Particulate Emissions

Company Name: Frito-Lay, Inc.
Address City IN Zip: 323 S. County Rd., 300 W., Frankfort, IN 46041-8780
FESOP Renewal No.: 023-16054-00020
Reviewer: Alic Bent / EVP
Date: September 24, 2002

PM-10 Emissions

Emission Unit ID	Emission Unit Description	Control Device % Efficiency	Grain Loading Rate (gr/acfm)	Air Flow Rate (acfm)	Uncontrolled Potential Emissions (ton/yr)	Controlled Potential Emissions (ton/yr)
NBP-9C	Corn Unloading/Storage	99.00%	0.01	19	0.71	0.01
NBP-9D	Corn Unloading/Storage	99.00%	0.01	19	0.71	0.01
NBP-9E	Corn Transfer/Cleaning	99.00%	0.01	4900	183.96	1.84
NBP-22A	Corn Meal Unloading	99.00%	0.01	500	18.77	0.19

Total Uncontrolled Potential Emissions (tons/yr): 204.16

Total Controlled Potential Emissions (tons/yr): 2.04

Methodology:
Uncontrolled Potential Emissions (tons/yr) = Grain Loading (gr/acfm) x Air Flow (acfm) x 60 (min/hr) x 1/7000 (lb/gr) x 1 ton / 2000 lb x 8760 hrs / 1 yr x (1 / 1 - Control Efficiency (%))
Controlled Potential Emissions (tons/yr): Uncontrolled Potential Emissions (tons/yr) * (1 - control efficiency)